

Exhibit C
(Second Motion for Extension of Time (Clocked))

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

UNITED STATES OF AMERICA

v.

RUSSELL LUCIUS LAFFITTE,

Defendant.

Case No.: 9:22-cr-00658-RMG

MOTION FOR EXTENSION OF REPORTING DATE

Defendant Russell Lucius Laffitte (“Mr. Laffitte”), by and through undersigned counsel, respectfully moves this Court for a second extension of his reporting deadline to the Bureau of Prisons.

On August 8, 2023, Mr. Laffitte notified this Court of his intention to appeal. *See* ECF No. 319. On August 14, 2023, Mr. Laffitte filed a Motion for Release Pending Appeal with the Fourth Circuit Court of Appeals. *See* Docket # 23-4509. On August 25, 2023, the government filed its Response in Opposition and, on August 29, 2023, Mr. Laffitte filed his Reply to the government’s Response. As of the time of this filing, the Fourth Circuit has not yet issued an Order on the Motion for Release Pending Appeal.

On August 18, 2023, Mr. Laffitte was notified that he must report to a Bureau of Prisons facility by September 14, 2023 at 12 p.m. On August 21, 2023, Mr. Laffitte filed his first motion for an extension of his reporting deadline, a motion to which the government consented. *See* ECF No. 324. On that same day, this Court quickly granted that Motion and extended Mr. Laffitte’s reporting deadline until September 21, 2023 finding that Mr. Laffitte’s motion convinced the Court that there was “good cause shown” that Mr. Laffitte was entitled to the relief he sought. ECF No. 325. The same day, the government notified the Fourth Circuit that Mr. Laffitte’s

reporting date had been extended to September 21, 2023. Docket # 23-4509, ECF No. 19 at 2. Because this new deadline is less than a week away from today's date and the Fourth Circuit has yet to issue an Order on the Motion for Release Pending Appeal, Mr. Laffitte respectfully requests this Court grant at least another one-week extension to the current reporting deadline.

As noted above, the government consented to the first Motion for Extension, but the government advised undersigned counsel that it defers to the Court on the instant Motion. Mr. Laffitte notes that the circumstances of this case have not meaningfully changed since the government consented to the first request for an extension – the parties are still awaiting the Fourth Circuit's decision on Mr. Laffitte's Motion for Release Pending Appeal and Mr. Laffitte's reporting deadline is again imminent. Therefore, Mr. Laffitte respectfully submits that this Motion, like the first Motion, establishes good cause for the relief sought. As good cause still exists, Mr. Laffitte respectfully requests that this Court again grant an extension of his reporting deadline and extend that deadline until at least Friday, September 29, 2023.

[signature page follows]

Respectfully submitted,

s/Mark C. Moore

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